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September 19, 2011

FILED/ACCEPTED

BY HAND DELIVERY

SEP 19 2011

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

Re: Total Call Mobile Inc., Compliance Plan, CC Docket No. 96-45;
WC Docket No. 09-197

Dear Secretary Dortch:

On behalf of Total Call Mobile, Inc. ("Total Call Mobile"), enclosed please find an original and four copies of Total Call Mobile's proposed Compliance Plan ("Compliance Plan"). On May 25, 2011, Total Call Mobile filed a Petition for Forbearance ("Petition") requesting the Federal Communications Commission ("FCC" or "Commission") forbear from enforcement of section 214(e)(1)(A) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(e)(1)(A). The Commission issued a Public Notice seeking comment on Total Call Mobile's Petition and no oppositions were filed during the comment period. The Petition is pending with the Commission.

Total Call Mobile submits this filing to supplement information included in its Petition in order to assist the Commission's public interest analysis of the relief requested. The proposed Compliance Plan is similar to those filed by other eligible telecommunications carrier ("ETC") applicants seeking Lifeline authorization. It includes a description of Total Call Mobile's service packages, the process Total Call Mobile will use to verify a customer's eligibility for participation in the Lifeline program, the access to 911 and E911 services that Total Call Mobile will provide to subscribers, and provides information about how Total Call Mobile intends to comply with the conditions typically included in Commission grants of other ETC petitions. The proposed Compliance Plan also identifies the processes Total Call Mobile anticipates using once Total Call Mobile receives ETC authority and begins providing service.

Ms. Marlene Dortch
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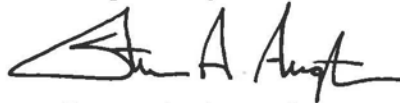
Total Call Mobile will evaluate the market at the time it receives ETC authorization and may adjust its proposed Compliance Plan at that time.

Further, Total Call Mobile clarifies that it seeks forbearance for purposes of providing Lifeline services only; Total Call Mobile does not seek to provide Link-Up services.

Due to the current harsh economic conditions throughout Total Call Mobile's service territories, there is an urgent need for these services. Total Call Mobile respectfully requests expeditious grant of its Petition and simultaneous approval of its proposed Compliance Plan.

Also enclosed is a duplicate of this filing. Please date stamp the duplicate and return it to the courier. Please direct any questions to the undersigned at (202) 342-8612.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steven A. Augustino". The signature is stylized with a large initial "S" and a long, sweeping underline.

Steven A. Augustino

Counsel to Total Call Mobile, Inc.

Enclosures

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	WC Docket No. 09-197
)	
Petition for Forbearance)	
)	

TOTAL CALL MOBILE, INC. COMPLIANCE PLAN

Background

On May 25, 2011, Total Call Mobile, Inc. (“TCM” or “Company”) filed a Petition for Forbearance (“Petition”) requesting the Federal Communications Commission (“FCC” or “Commission”) forbear from enforcement of section 214(e)(1)(A) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(e)(1)(A), which requires eligible telecommunications carriers (“ETC”) to use their own facilities to provide services supported by the Universal Service Fund (“USF”). The Commission issued a Public Notice seeking comment on Total Call Mobile’s Petition and no comments opposing the Petition were filed as of September 8, 2011.¹

Previously, when the Commission granted similar requests for forbearance, it has issued several conditions and required the carrier to file a Compliance Plan within 30 days outlining the ETC’s procedures for complying with those conditions.² Typically, the Commission’s prior grants of forbearance have been made subject to the following conditions: (a) provide Lifeline customers with 911 and Enhanced 911 (E911) access regardless of activation status and availability of prepaid minutes; (b) provide Lifeline customers with E911-compliant handsets and replace, at no additional charge to the

¹ *Wireline Competition Bureau Seeks Comments on Total Call Mobile, Inc. Petition for Forbearance from Eligible Telecommunications Carrier Facilities Requirement*, Public Notice, DA 11-960 (rel May 26, 2011).

² See e.g., *Virgin Mobile USA, L.P. Petition for Forbearance*, Order, 24 FCC Rcd 3381, ¶ 30 (2009) (“*Virgin Mobile Order*”); *i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, Order, 25 FCC Rcd 8784 (2010) (“*i-wireless Order*”).

customer, noncompliant handsets of existing customers who obtain Lifeline-supported service; (c) comply with conditions (a) and (b) as of the date the ETC provides Lifeline service; (d) obtain certification from each PSAP where the carrier seeks to provide Lifeline service confirming that the carrier provides its customers with 911 and E911 access or to self-certify that it does so if certain conditions are met; (e) require each customer to self-certify at the time of service activation and annually thereafter that he or she is the head of household and receives Lifeline-supported service only from that carrier; (f) establish safeguards to prevent customer from receiving multiple Lifeline subsidies from the carrier at the same address; and (g) deal directly with the customer to certify and verify the customer's Lifeline eligibility.³

The Petition filed by TCM is still pending with the Commission. However, due to the current harsh economic conditions throughout TCM service territories, there is an urgent need for these services. As such, TCM has prepared the following Compliance Plan, which complies with those conditions previously adopted in similar cases as well as incorporates new requirements of recent orders. TCM respectfully requests expeditious grant of its Petition and simultaneous approval of its proposed Compliance Plan. Pending the Commission's issuance of new rules in its Lifeline rulemaking proceedings, TCM proposes the following plan to implement policies and procedures in order to combat waste, fraud and abuse. The plan would be modified to conform to any new rules and orders, once issued and effective.

COMPLIANCE PLAN

TCM commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. TCM will comply with all conditions set forth in any Commission order granting its Petition, the provisions of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireless service to customers throughout its service territories. In order to be clear, TCM will not provide Tribal Lifeline service or request Link Up reimbursement.

³ See *Virgin Mobile Order* at ¶¶ 22-23; *i-wireless Order* at ¶¶ 11-16.
DC01/SMITD/455395. 4

I. Access to 911 and E911 Services

TCM will be required to provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service, and, in order to demonstrate compliance with the condition, TCM must obtain certification from each PSAP where it provides Lifeline service confirming that its customers receive 911 and E911 services. (A form of PSAP certification is attached hereto as Exhibit A). If within 90 days of TCM's request, a PSAP has neither provided the certification nor made an affirmative finding that the Company does not provide its customers with 911 and E911 services within the applicable service area, then TCM may self-certify that it meets the requirements.

The Commission and consumers are hereby assured that all TCM customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from TCM handsets, even if the account associated with the handset has no minutes remaining. TCM can assure the Commission that all Lifeline customers will have meaningful access to emergency calling services at the time the customer activates Lifeline service, and that such access will continue regardless of the customer's account status or the availability of prepaid minutes.

The Company's existing practices currently provide access to 911 and E911 services for all customers. TCM uses Sprint as its underlying network provider/carrier. Sprint routes 911 calls from TCM's customers in the same manner as 911 calls from Sprint's own retail customers. To the extent that Sprint is certified in a given PSAP territory, this 911 capability will function the same for TCM. TCM also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active, suspended or terminated. Finally, the Company transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

TCM will implement the following measure prior to deploying Lifeline services in a given area. Initially, the Company will confirm that its underlying carrier has deployed E911 services in a specific PSAP territory. TCM will obtain the requisite certification from each PSAP where it provides Lifeline service confirming that its

customers receive 911 and E911 services. If within 90 days of receiving the Company's request, a PSAP has neither provided such certification nor made an affirmative finding that the Company does not provide its customers with 911 and E911 services within the applicable service area, TCM will self-certify that it meets the basic and E911 requirements.

II. E911-Compliant Handsets

Total Call Mobile, Inc. will ensure that all handsets used in connection with the Lifeline service offering will be E911-compliant. In fact, TCM's phones have always been and will continue to be 911 and E911-compliant. TCM uses phones from Sprint that have been through a stringent certification process with Sprint, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

III. Certification of Initial and Ongoing Lifeline Customers' Eligibility

TCM is committed to safeguarding against misuse of the Lifeline service plan. TCM will deal directly with the customer and require each customer to self-certify under penalty of perjury at the time of service activation and annually thereafter that they are the head of household and receive Lifeline-supported service only from Total Call Mobile. TCM also will establish safeguards to prohibit more than one supported TCM service at each residential address. TCM proposes the following plan to implement these certification and verification conditions:

A. Policy

TCM will comply with all certification and verification requirements for Lifeline eligibility established by the FCC and states where it is designated as an ETC. In states where there are no state imposed requirements, TCM will comply with the certification and verification procedures in effect in that state as reflected on the website of the Universal Service Administration Company ("USAC"). However, for any states which do not mandate Lifeline support and/or which do not have established rules of procedure

in place, TCM will certify at the outset and will verify annually consumers' Lifeline eligibility in accordance with the Commission's requirements. The TCM process requires a customer-signed, annual certification form to be entered into its systems prior to any benefits being extended for the next year. Lifeline benefits will not continue to be extended until all eligibility requirements are met.

TCM will also comply with the Commission's regulations to prevent duplicate payments and de-enrollment procedures.⁴ The Company will promptly cooperate with USAC and respond to any USAC notifications concerning duplicate payments and de-enrollment of customers. TCM commits to complying with any future orders related to the Lifeline program and is committed to working with the Commission and USAC to reduce waste, fraud and abuse in the program.

B. Certification Procedures

TCM will implement certification procedures that require consumers to demonstrate their eligibility for Lifeline assistance. Customers will be able to sign up for Lifeline assistance by contacting TCM via telephone, facsimile, or the internet. At the point of sale, consumers will be provided with printed information describing TCM's Lifeline program, including eligibility requirements, and with instructions for enrolling. Consumers will be directed to a toll-free telephone number and to TCM's website, which will contain a link to information regarding the Company's Lifeline service plan, including a detailed description of the program and state-specific eligibility criteria. TCM understands and accepts the Commission's requirement that the Company have direct contact with all customers applying for participation in the Lifeline program. Retailers will have no role in the Lifeline application process, other than to provide customers with printed information regarding the program.

1. Call Center Procedures

Consumers will be directed to call a toll-free number to complete an application over the phone. The application will then be mailed to the customer for signature under

⁴ The Commission adopted new regulations and procedures on June 21, 2011. *See Lifeline and Link UpReform and Modernization*, Report and Order, FCC 11-97 (rel. June 21, 2011).

penalty of perjury and for the submission of supporting documentation. The signed application and support documentation must be mailed to the address provided by the Company. Processing of consumers' applications, including review of all application forms and relevant documentation will be performed under TCM's supervision by managers thoroughly trained in the requirements of the Lifeline program. TCM will ensure that all required documentation is taken care of properly by using state-specific compliance checklists.

TCM will emphasize the "one Lifeline phone per household" restriction during the initial interview with the potential customer when they call into the call center. The call center introduction script substantially in the form TCM would use is attached as Exhibit B.

2. In-person Sales Efforts

TCM will promote its Lifeline services through many channels. One sales channel will be in-person sales events staffed by TCM representatives or agents. At these events, customers will be allowed to sign up, in-person, for Lifeline service. TCM representatives or agents, fully trained in Lifeline requirements, will conduct an interview, ensuring that the potential customer does not already receive a Lifeline subsidy (see Exhibits C and D). Documentation proving eligibility for the program will also be collected and an application will be completed by the customer. Only after completing all required eligibility verification will TCM issue phones to the customer.

At retail outlets where trained TCM representatives or agents are not present, customers will not have access to Lifeline services (or receive a Lifeline handset) at the retail location. Instead, customers will be directed via the print ads and information brochures made available to them to contact TCM directly, and to submit the Lifeline service application directly to TCM. Through TCM's certification procedures the company would verify that the individual qualifies for a Lifeline plan (*i.e.* that there is no duplication, and that the individual qualifies by virtue of participation in an eligible state or federal low income program). Only after the customer is verified as qualifying to receive Lifeline, will the phone be provided to the customer via mail or subsequent pickup.

3. Applications, Information and Disclosures

TCM's Lifeline application form will include a certification section where the applicant must attest and sign under penalty of perjury that the applicant meets the relevant eligibility criteria. For states with program-based eligibility criteria, the form will list each of the qualifying programs, and the applicant will be required to identify the program(s) in which they participate and will be required to provide proof of such program participation. For states with income-based eligibility criteria, the applicant will be required to certify under penalty of perjury that their household income does not exceed the relevant threshold (*e.g.*, 135% of the Federal Poverty Guidelines for federal default states) and will be required to provide proof of income-based eligibility. Applicants will also be required to certify under penalty of perjury that they are head of their household and receive Lifeline-supported service only from TCM. Penalties for perjury will be clearly stated on the certification form (actual certification wording shown below).

By signing below, I certify under penalty of perjury that the information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by law. I understand that Lifeline is only available for one landline or wireless phone line per household. I am the head of household and will only receive Lifeline from TCM. Furthermore, I certify that I will only use this phone for my and my family's own use and will not resell it. I will notify TCM immediately, at the 800 number provided, if I no longer qualify for Lifeline, or if I have a question as to whether I would still qualify.

This certification will be prominently displayed on the application in a minimum of 12 point font. Customers will be required to sign and date this statement.

Further, the application forms will require each applicant to provide their name, primary residential address and an alternate telephone number (if any). TCM will incorporate this information into its customer information database. The Company will check the name and address of each Lifeline applicant against its database to determine whether or not it is associated with a customer that already receives TCM Lifeline

service, and will then review the application to ascertain whether the applicant is attempting to receive Lifeline-supported service for more than one handset associated with the address. TCM will deny the Lifeline application of any such individual and advise the applicant of the basis for the denial.

All advertising, including the company's website, will contain full disclosure about the program and its requirements, including eligibility requirements. The one phone per household requirement will be emphasized in these materials. Advertising will be state specific as to eligibility. The company's website will allow for customers to view eligibility and requirements for their state.

TCM shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent TCM customers from engaging in such abuse of the program..

C. De-enrollment Policy and Procedures

1. Non-usage Policy

TCM will implement a non-usage policy whereby we will identify Lifeline customers that have not used the Company's Lifeline service for 60 days, and cease to claim Lifeline reimbursements for such customers if they do not use their service within a 30-day grace period following the initial 60-day non-usage period. Specifically, if no usage appears on an TCM Lifeline customer's account during any continuous 60-day period, TCM will promptly notify the customer that the customer is no longer eligible for TCM Lifeline service subject to a 30-day grace period. During the 30-day grace period, the customer's account will remain active, but TCM will engage in outreach efforts to determine whether the customer desires to remain on the Company's Lifeline service. If the customer's account does not show any customer-specific activity during the grace period (such as making or receiving a voice call, sending a text message, downloading data or adding money to the account), TCM will deactivate Lifeline services for that customer. In addition, TCM will not seek to recover a federal Universal Service Fund

subsidy for the minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer re-initiates service.

2. Duplicate Notifications

TCM has and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. This cooperation includes providing state commissions (PUC), the FCC or USAC upon request with data that will enable that state, the FCC or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, TCM agrees to make available state-specific customer data, including name and address, upon request to each state PUC where it operates, the FCC or USAC for the purpose of permitting any state or federal regulator to determine whether an existing Lifeline customer receives Lifeline service from another carrier.

TCM will promptly, and in any event within 5-days, de-enroll any customers for which it receives such instruction from USAC under the FCC's Lifeline and Link Up Reform and Modernization Report and Order dated June 22, 2011. Such de-enrollment will immediately deactivate a customer's Lifeline service and TCM will no longer report that customer on USAC Form 497.

D. Verification Procedures

TCM will require every consumer enrolled in the Lifeline program to verify on an annual basis that they are the head of their household and only receive Lifeline service from TCM. TCM will notify, in writing, each participating Lifeline consumer on the anniversary of their enrollment that they must confirm their continued eligibility in accordance with the applicable requirements. This notification will be mailed via the U.S. Postal Service to the address the subscriber has on record with TCM. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact TCM. Customers will have 60 days to complete the form, certify under penalty of perjury that they are the head of household and receive Lifeline service only from TCM, and return the form to TCM by mail. Anyone who does not respond to the mailing and certify their continued eligibility will be removed from the Lifeline program.

Currently, customers will be required to complete the verification process by mail; however, TCM is considering other methods of verification, such as web-based or handset data session methods, in the future. Such methods would be a convenience, as well as reduce costs. As long as the integrity of the verification does not suffer, these methods may be employed in the future.

TCM submits that its Compliance Plan fully satisfies the conditions that have previously been set forth by the Commission in prior orders granting forbearance. Implementation of the procedures, outlined in this plan, will promote public safety and ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the company's Lifeline service benefits. TCM's service plans to be offered to Lifeline eligible customers, which are competitive with the prevailing market, are attached as Exhibit E.

Conclusion

TCM respectfully requests that the Commission expeditiously approve its Compliance Plan so that the company may begin providing the benefits of Lifeline service to qualified low-income customers as soon as possible.

Respectfully submitted,

/s/ electronically signed

EXHIBIT A

Public Safety Answering Point Coordinator

[Address]

RE: Request for PSAP Certification for Lifeline Participation

Dear PSAP Coordinator:

This is to inform you that Total Call Mobile ("TCM"), has been designated an Eligible Telecommunications Carrier ("ETC") by the Federal Communications Commission ("FCC") for the purposed of offering reduced-cost service to low-income customers in the state of [State] under the federal Lifeline program. (See attached FCC Order _____ released _____.)

Lifeline ensures that low-income customers have access to quality telephone service at a reasonable, affordable rate, and TCM is pleased to be among the wireless carriers offering Lifeline service to low-income customers, particularly during this difficult economic environment.

The FCC's approval for TCM to offer Lifeline service was conditional upon the following requirements: (1) offer 911 and enhanced 911 (E911) access immediately upon activation of service, and (2) provide its new Lifeline customers with E911-complaint handsets and replace, at no additional charge to the customer, noncompliant handsets of existing customers who subscribe to Lifeline service. The FCC further required that TCM seek certification from each Public Safety Answering Point ("PSAP") where TCM intends to offer Lifeline service confirming that TCM provides its customers with 911 and E911 access. TCM is seeking this certification from your PSAP based on the information provided in this letter and any additional information you may request.

TCM wireless services operate on the Sprint Nextel ("Sprint") network. As you may be aware, Sprint has completed the deployment of facilities necessary to offer Phase I and/or II E911 services in your service area, providing Sprint and TCM customers with 911 and E911 access. TCM Lifeline customers will enjoy this same access to 911 and E911 service once activated for service, regardless of activation status or availability of prepaid airtime. As required by the FCC, all TCM handsets will comply with applicable federal requirements governing the provision of 911 and E911 service. TCM will provide new Lifeline customers with E911-compliant handsets and, for existing customers who subscribe to Lifeline service, will verify that their handsets are E911-compliant or replace the handset at no charge to the customer.

For your convenience, enclosed is a certification form for your review and signature as PSAP Coordinator. Please return the signed certification form in the self-addressed stamped envelope. As required by the FCC, TCM will keep the certification on file in the event the FCC seeks to review this documentation. **If within 90 days of receipt of this letter, you do not provide the certification or make an affirmative finding that TCM does not provide its customers with 911 and E911 service in your area, TCM is permitted to self-certify compliance with the requirements for 911 and E911 access for this PSAP.** (See FCC order _____ at para. _____.)

Should you have any questions about the foregoing, please contact us at [email]. Please be sure to include your name and address in the email.

Thank you in advance for your cooperation and for enabling TCM to offer Lifeline service to low-income customers in your PSAP jurisdiction.

Sincerely,

Total Call Mobile

Total Call Mobile Lifeline Program

PSAP Certification Form

State of _____

PSAP Name: _____

PSAP Coordinator Name: _____

Business Address: _____

PSAP Jurisdiction Description: _____

In my capacity as the Coordinator for the Public Safety Answering Point ("PSAP") described above, I am responsible for the implementation of 911 and Enhanced 911 ("E911") service in accordance with the rules and regulations of the Federal Communications Commission ("FCC").

I have been informed by Total Call Mobile ("TCM") that, by Order dated _____, the FCC has designated TCM as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (47 U.S.C. § 214(e)(6)), for the limited purpose of providing Lifeline service in [State], among other states. I have further been informed that the FCC's designation of TCM as an ETC is subject to certain conditions, including a condition that TCM must obtain certification from each PSAP where it will offer Lifeline service that TCM customers will have 911 and E911 access immediately upon activation of service.

In connection with its request for certification by the PSAP, TCM has provided certain information. I have been informed by TCM that its wireless service operates on the Sprint Nextel ("Sprint") network. TCM has indicated that its Lifeline customers will have the same access to 911 and E911 service as the retail customers of Sprint. In addition, TCM has represented that its Lifeline handsets will comply with the FCC Order requiring that the handsets be capable of accessing 911 and E911 service regardless of activation status or availability of prepaid airtime.

Upon information and belief, in my capacity as PSAP Coordinator, I hereby certify that TCM has provided evidence that it is complying with the FCC requirement that it provide customers with access to basic and E911 service immediately upon activation of Lifeline service.

Dated: _____

Signature of PSAP Coordinator

EXHIBIT B

Exhibit B

Total Call Mobile Script/FAQ's Updated August 18, 2011

Greeting: "Thank you for calling Total Call Mobile. This is (Representative Name). May I please have your last name and the state you are calling from?"

** Representative "Are you calling about a new application or to check the status of a previous application?"**

- **Make sure state is an approved state**

If not ** Representative - "I am sorry, we are not currently providing service in your state. You can go to www.usac.org/li to find a provider in your state. Click on the Low Income Households section and then click on find a service provider in your state**

- **If status of application:** **Representative - "May I please have your address?"**

- ✓ locate application
- ✓ double check address (make sure the address is valid and correct)
- ✓ relate the status to customer
- ✓ note the contact on the account

- **If new application:** **Representative - "Great! Thank you for calling Total Call Mobile."** and perform the following validations.

- a) "Are you the head of household?" If not then, "We can only provide service to the head of household. Please have the head of household call us and we'd be happy to sign them up." If yes, go to (b).
- b) "Do you currently have wireless or home phone service?" If no, skip the remaining questions and process application.
- c) (if yes) "Is that a subsidized service or do you pay full price?"
- d) (if subsidized) "Is this phone under the Lifeline program? The Lifeline program is only available for one phone per household." If yes go to (e), if they don't know go to (f), if no, go to (g).
- e) "We cannot provide you with a second Lifeline phone. If there is a problem with that service or you want to be on our service, you must first disconnect your service with your other provider and then call back to establish service with us."
- f) "Can I ask who your provider is?" Check against the larger Lifeline providers (Exhibit C, updated from time-to-time).
- g) (if not subsidized) "Can I ask who your provider is?" Check against the larger Lifeline providers (Exhibit C, updated from time-to-time).

If it is evident that they don't already have Lifeline service then process application.

EXHIBIT C

Exhibit C

List of larger Lifeline Providers Updated August 18, 2011

Safelink

Assurance

ReachOut Wireless/Nexus

TAG Mobile/DPI

EXHIBIT D

Exhibit D

Total Call Mobile Sales Training Materials Updated August 18, 2011

Refer to the state specific one page Sales Information sheet for state specific, program information.

If customer is interested in Lifeline service, determine whether or not they are eligible under one of the programs or the income threshold (if applicable) using the state specific information sheet. Please complete the following steps:

1. Ask the following questions:
 - a) “Do you currently have wireless or home phone service?” (if no, skip (b) – (e))
 - b) **If yes:** “Is that [wireless or home phone] service a subsidized or no-charge service, or do you pay full price?”
 - c) **If subsidized:** “By law, the Lifeline program is only available for one phone per household. Do you know if your current phone is subsidized under the Lifeline program?”
 - d) **If they are unsure:** “Who is your provider for that service?” Compare answer with Lifeline provider list (Exhibit C), if it is evident that they are already on Lifeline, go to (e). If a more ambiguous provider, e.g., Verizon, Pacific Bell or Illinois Bell, try to dig further to determine if they have Lifeline by asking if they pay a subsidized or reduced rate.
 - e) **If it is Lifeline:** “We cannot provide you with a second Lifeline phone. If there is a problem with that service or you want to be on our service, you must first disconnect your service with your other provider and then call back to establish service with us.”

If it is evident that they don’t already have Lifeline service, then proceed to step 2:

2. Perform an address search to insure there isn’t already a TCM phone registered to that address.
 - a) If there is an active TCM phone registered at that address, then thank customer for their interest, explain the situation and say “by law, the Lifeline program is only available for one phone per household”.
 - b) If there isn’t an active TCM phone registered at that address, proceed to step 3.
3. Assist customer in filling out the state specific application. Use the application guide/checklist to make sure it is filled out appropriately. Review the documentation for program/income proof closely against the guidelines to make sure the documentation meets the requirements.

EXHIBIT E

EXHIBIT E

Proposed Service Offering

TCM's Lifeline offering proposes to give eligible customers three Lifeline Plan choices:

Option 1: Lifeline 150 Minute Plan*

150 anytime minutes per month

(additional usage priced at 10 cents per minute, texts are 5 cents per text message by loading an "Anytime Plan" refill card to the handset account)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- 150 anytime minutes. The 150 anytime minutes expire if not used within thirty (30) days of receipt of the handset
- "International Location Promo" - No additional charge for international calling to the 250 locations listed on Exhibit F, as on the standard TCM Anytime Plan (i.e. only the standard per minute rate applies)
- International calls to other destinations require additional funds based on call destination

Option 2: Lifeline 250 Minute Plan*

250 anytime minutes per month

(additional usage priced at 10 cents per minute, texts are 5 cents per text message)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- 250 anytime minutes. The 250 anytime minutes expire if not used within thirty (30) days of receipt of the handset
- The "International Location Promo" does not apply to the Lifeline 250 Minute Plan
- International calls require additional funds based on call destination.

Option 3: Lifeline Credit - Discount on Certain 30 Day Plans*

Lifeline eligible customers may choose either the 30 Day Unlimited Talk, Text, and Data or the 30 Day Unlimited Talk and Text prepaid retail plan at a discount, which will differ based on the customer's state (discount will range from \$10 - \$20). Details on TCM's 30 Day Unlimited Talk, Text, and Data or 30 Day Unlimited Talk and Text plans can be found at http://www.totalcallmobile.com/rateplans_prepaid.aspx

*This package includes:

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries

EXHIBIT F

Free International Calling Destinations on the Lifeline 150 Minute Plan (Certain special or off-network locations may be excluded from the Free International Calling Destinations)

FREE International Calling to over 250 locations Worldwide and 30 countries

(termination to landline phones only, termination to mobile phones excluded)

Locations are subject to change from time to time. Please visit totalcallmobile.com for an updated list.

Featured Countries		
Argentina	Greece	Norway
Argentina-Buenos Aires	Greece-Athens	Peru
Argentina-Cordoba	Hong Kong	Peru-Lima
Argentina-Mendoza	Hong Kong-Cellular	Poland
Argentina-Rosario	Hungary	Poland-Warsaw
Australia	Hungary-Budapest	Portugal
Australia-Melbourne	India	Singapore
Austria	India-Ahmedabad	Singapore-Cellular
Brazil	India-Bangalore	South Korea
Brazil-Belo Horizonte	India-Bombay	South Korea-Seoul
Brazil-Campinas	India-Calcutta	Spain
Brazil-Rio de Janeiro	India-Cellular	Sweden
Brazil-Sao Paolo	India-Hyderabad	Switzerland
Canada	India-Madras	Taiwan
China	India-New Delhi	Taiwan-Taipei
China-Beijing	India-Pune	Thailand
China-Cellular	India-Punjab	Thailand-Bangkok
China-Guangzhou	Ireland	Thailand-Cellular
China-Shanghai	Israel	United Kingdom
Cyprus	Italy	US Guam
Denmark	Mexico (city list which follows)	US Puerto Rico
France	Netherlands	US Saipan
France-Paris	Netherlands-Amsterdam	US Virgin Island
Germany	New Zealand	

EXHIBIT F (continued)

Free International Calling Destinations on the Lifeline 150 Minute Plan (continued) **Mexico City List**

Guadalajara
Ciudad de Mexico
Monterrey
Acaponeta
Acapulco
Actopan
Agua Prieta
Aguascalientes
Allende
Apatzingan
Apizaco
Arcelia
Atlacomulco
Atliaca/Tixtla
Atlixco
Autlan
Bahia de Huatulco
Cabo San Lucas
Caborca
Cadereyta Jimenez
Campeche
Cananea
Cancun
Celaya
Cerralvo
Cheumal
Chihuahua
Chilapa
Chilpancingo
Cintalapa de Figueroa
Ciudad Acuna
Ciudad Altamirano
Ciudad Camargo B
Ciudad Constitucion
Ciudad Cuauhtemoc
Ciudad del Carmen
Ciudad Delicias
Ciudad Guzman
Ciudad Hidalgo
Ciudad Juarez
Ciudad Lazaro Cardenas
Ciudad Mante
Ciudad Obregon
Mexico City List (continued)

Ciudad Sahagun
Ciudad Valles
Ciudad Victoria
Coatzacoalcos
Colima
Cordoba
Cosamaloapan
Cozumel
Cuautla
Cuernavaca
Culiacan
Durnago
Encarnacion de Diaz
Ensenda
Estación Manuel
Fresnillo
General Tapia
Guamuchil
Guanajuato
Guasave
Guaymas
Guerrero Negro/Santa Rosa
Hermosillo
Heroica Ciudad de Ures
Hidalgo
Huatabampo
Huetamo
Huimanguillo
Huitzuco
Iguala
Irapuato
Ixtapan de la Sal
Ixtlan del Rio
Izucar de Matamoros
Jalapa
Jalpa
Jerez de Garcia Salinas
Jojutla
Juchitan
La Barca
La Paz
La Piedad
Lago de Moreno
Leon
Lerdo de Tejada
Lerma
Linares
Los Mochis
Mexico City List (continued)

**Los Reyes
Magdalena
Manuel
Manuel Ojinaga
Manzanillo
Martinez de la Torre
Matamoros
Matehuala
Mazatlan
Merida
Mexicali
Minatitlan
Monclova
Moelia
Moroleon
Nacozari de Garcia
Navojoa
Nogales
Nuevo Casas Grandes
Nuevo Laredo
Oaxaca de Juarez
Ocotlan
Ometepec
Orizaba
Pachuca
Palenque
Parral
Parras de la Fuente
Patzcuaro
Penjamo
Petatlan
Piedras Negras
Playas de Rosarito
Poza Rica de Hgo
Puebla
Puerto Penasco
Puerto Vallarta
Puruandiro
Queretaro
Quimichis/Tecuala
Reynosa
Rio Grande
Rio Verde
Sabinas
Sahuayo
Salamanca
Saltillo
Salvatierra
Mexico City List (continued)**

San Andres Tuxtla
San Cristobal de las Casas
San Fernando
San Jose de Gracia
San Jual del Rio
San Luis de La Paz
San Luis Potosi
San Luis Rio Colorado
San Martin Pachivia/Teloloapa
San Miguel de Allende
San Quintin
Santa Ana
Santa Rosalia de Camargo
Santiago Ixcuintla
Santiago Papasquiario
Santiago Tianguistenco
Silao
Tala
Tampico
Tapachula
Taxco
Tecate
Tecoman
Tecpan de Galeana
Tehuacan
Tenancingo
Tenango del Aire/Tlalmanalco
Tepatitlan
Tepic
Tequila
Texcoco
Teziutlan
Ticul
Tijuana
Tizayuca
Tizimin
Tlapa de Comonfort/Alcozauca de Gro.
Tlaxcala
Toluca
Torreon
Tula
Tulancingo
Tuxpan
Tuxtepec
Tuxtla Guttierrez
Uruapan
Valle de Bravo
Veracruz
Mexico City List (continued)

Villa Flores
Villahermosa
Yurecuaro
Zacapu
Zacatecas
Zamora
Zihuatanejo
Zinapécuaro
Zitacuaro
Zumpango